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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,

Plaintiff,

vs.

HAROLD DAVID SOBEL,

Defendant.

CASE NO.: 2:21-cr-00235-APG-EJY

**STIPULATION TO EXTEND TIME TO
RESPOND TO GOVERNMENT'S
MOTION AND PROPOSED ORDER
(First Request)**

IT IS HEREBY STIPULATED AND AGREED, by and between Christopher Chiou, Acting United States Attorney for the District of Nevada, and Mina Chang, Assistant United States Attorney, and Gustav W. Eyler, Director, and Meredith B. Healy and Wei Xiang, Trial Attorneys, U.S. Department of Justice, Consumer Protection Branch, counsel for the United States of America, and Jacqueline Tirinnanzi and Kathleen Bliss, counsel for Harold David Sobel, request that the Court extend the deadline to respond to the government's motion to find defendant knowingly breached plea agreement (ECF No. 38) by thirty days. This stipulation is made and based upon the following:

1. On March 25, 2022, the Court continued the parties' motion deadline to April 11, 2022, the response deadline to April 25, 2022, and the reply deadline to May 2, 2022. (ECF No. 30). During the change of plea hearing held the same day, the Court requested briefing on whether Mr. Sobel knowingly breached the parties' executed plea agreement. Mar. 25, 2022, Hr'g Tr. at 8:23-10:3.
2. On April 6, 2022, the parties filed a stipulation for extension of time to continue the motion deadline to April 25, the response deadline to May 9, and the reply deadline to

May 16 (ECF No. 32), which the Court granted on April 11, 2022 (ECF No. 33).

3. On April 22, 2022, Jacqueline Tirinnanzi was appointed to represent Mr. Sobel by the District of Nevada after prior representation for Mr. Sobel withdrew on April 19, 2022 due to a conflict in representation. (ECF Nos. 36, 37).
4. On April 25, 2022, the government filed a motion to find defendant knowingly breached plea agreement (ECF No. 38), the response to which was due on May 9, 2022.
5. The government has disclosed some discovery in this matter that includes approximately 4,800 pages of emails and related records and a 3.5-hour long audio recording. The government has indicated that additional discovery is imminent as well. Counsel needs time to review the discovery, meet with the client, and prepare a response.
6. Mr. Sobel remains in custody at the Nevada Southern Detention Center in Pahrump, Nevada. Due to other case commitments and her travel schedule, counsel for Mr. Sobel had been unable to meet with him in Pahrump prior to the currently scheduled opposition due date.
7. Accordingly, the parties agree to a 30-day extension of the response and reply dates. The parties agree that defendant's response shall be due on or before June 8, 2022. The government's reply shall be due on or before June 15, 2022.
8. The additional time requested herein is sought in good faith and not for purposes of delay.

Dated this May 10, 2022.

CHRISTOPHER CHIOU
Acting United States Attorney

By /s/ Mina Chang
MINA CHANG
Assistant United States Attorney

GUSTAV W. EYLER
Director
U.S. Department of Justice

1 By /s/ Meredith Burns Healy
2 MEREDITH BURNS HEALY
3 Trial Attorney

4 By /s/ Wei Xiang
5 WEI XIANG
6 Trial Attorney

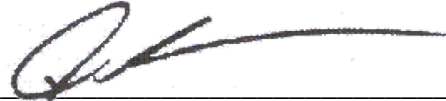
7 /s/ Jacqueline Tirinnanzi
8 JACQUELINE TIRINNANZI, ESQ.
9 Counsel for Harold David Sobel
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ORDER

Based upon the stipulation of the parties, and good cause appearing, it is hereby ORDERED that defendant's response to the government's motion to find defendant knowingly breached plea agreement (ECF No. 38) shall be due on or before June 8, 2022. The government's reply shall be due on or before June 15, 2022.

DATED: May 11, 2022



THE HONORABLE ANDREW P. GORDON
UNITED STATES DISTRICT JUDGE

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